



Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

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Matthew J. Strickler
Secretary of Natural Resources

David K. Paylor
Director
(804) 698-4000

November 10, 2020

VIA ELECTRONIC MAIL

Mr. Jody Hawks
Environmental Manager
BAE Systems, Ordnance Systems, Inc.
Radford Army Ammunition Plant
4050 Pepper's Ferry Road
Radford, Virginia 24141

**Re: Multi-Pathway Risk Assessment Report for the Part B Permit Application for the
Renewal of the Hazardous Waste Subpart O Explosive Waste Incinerator Permit –
First Notice of Deficiency
Radford Army Ammunition Plant (RAAP), Radford, Virginia
EPA ID#: VA1210020730**

Dear Mr. Hawks:

The Virginia Department of Environmental Quality's Office of Financial Responsibility and Waste Programs (DEQ) has completed the review of the Radford Army Ammunition Plant (RAAP) facility's Multi-Pathway Risk Assessment Report for the Energetic Waste Incinerator Permit for the Storage and Treatment of Hazardous Waste (EWI MPRA Report) dated and received on September 22, 2020. The EWI MPRA Report was received in response to the extension request received on June 4, 2020 and approved on June 16, 2020.

Based on the review of the EWI MPRA Report DEQ has the following comments:

- 1 Section 2.3: Please state the date of the RSL Table used for the toxicity factors in Table 2-3.
- 2 Table 2-3: Please replace "AIEC" with "AEGL" to maintain consistency with Section 2.3

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- 3 Table 2-3: The inhalation IUR for 2,3,7,8 TCDD is listed as 1.77E+05 in Table 2-3, however it is listed as 3.8E+01 in the most recent RSL Table. Inconsistencies with the current table were also identified for cadmium, chromium, and other compounds. A review of all toxicity factors used in the risk assessment is recommended and any revisions or additional language to detail the inconsistencies shall be added to Section 2.3 and Table 2-3.
- 4 Appendix B: Tables: Please add footnotes to denote what “#NUM” represents in the tables.

Please review the comments and provide a revised report which incorporates the revisions within 30 days (December 10, 2020).

If you have any questions concerning the information provided in this letter, please contact me at (804) 698-4467 or by email at Ashby.Scott@deq.virginia.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ashby R. Scott', with a stylized, cursive script.

Ashby R. Scott
Hazardous Waste Permit Writer
Office of Financial Responsibility and Waste
Programs

cc: Central Hazardous Waste Files
Mindy Lemoine, EPA, Region III (3LC50)
Nikki Herschler, Rebecca Wright, DEQ BRRO
Leslie Romanchik, Kyle Newman, Brett Fisher, Brian Burton, DEQ, CO

Jim McKenna, Radford Army Ammunition Plant